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VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)
Proposed Modification of Pretrial Release Order

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to add David McNamara, the husband of Sandra Ann Crain, as an additional third-party custodian. The Court previously approved Ms. Crain, Danielle Goettsche and Victoria Landerman as third-party custodians. U.S. Pretrial Services Officer David Hernandez has approved Mr. McNamara as a suitable fourth third-party custodian. I have reviewed each of the terms of the bail conditions with Mr. McNamara. He understands and accepts his responsibilities as a third-party custodian.

Pretrial Services has no objection to this proposed request. The government, through AUSA Jamie Solano, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

cc: Matthew Menchel, Esq.
Carolina Leung, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)